

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Counsel to Ad Hoc Committee of Supporting  
Counsel*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**NOTICE OF APPEAL**

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**Part 1: Identify the appellants**

*Name of appellant:* The Ad Hoc Committee of Supporting Counsel.

*Position of appellant in the bankruptcy case that is the subject of this appeal:* The Ad Hoc Committee of Support Counsel is a group of law firms who represent certain talc claimants.

**Part 2: Identify the subject of this appeal**

*Describe the judgement, order, or decree appealed from:* Under 28 U.S.C. § 158 and Federal Rules of Bankruptcy Procedure 8002 and 8003, Appellant hereby gives notice of appeal to the United States District Court for the District of New Jersey from the Bankruptcy Court's *Memorandum Opinion* [Dkt. 1127], attached as Exhibit A to the *Declaration of Seth Van Aalten*, filed contemporaneously herewith (the "Counsel Declaration"), and implementing *Order (I) Dismissing Debtor's Chapter 11 Petition Pursuant to 11 U.S.C. 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* [Dkt. 1211] (the "Dismissal Order"), attached as Exhibit B to the Counsel Declaration.

*State the date on which the judgment, order, or decree was entered:* The Dismissal Order was entered on August 11, 2023. The court issued its Memorandum Opinion on July 28, 2023.

**Part 3: Identify the other parties to the appeal**

The names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys are attached as Exhibit C to the Counsel Declaration.

**Part 4: Optional election to have appeal heard by District Court**

Not applicable in this judicial district.

**Part 5: Sign Below**

Dated: September 5, 2023

**COLE SCHOTZ P.C.**

/s/ Michael D. Sirota

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In re:

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Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**DECLARATION OF SETH VAN AALTEN REGARDING NOTICE OF APPEAL**

I, Seth Van Aalten, hereby declare under penalty of perjury:

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

1. I am member of the law firm of Cole Schotz P.C., and my office is located at 1325 Avenue of the Americas, New York, New York 10019. I am a member in good standing of the Bar of the State of New York. My application *pro hac vice* in this case has been granted by this Court. There are no disciplinary proceedings pending against me.

2. I submit this declaration (the “Declaration”) in connection with the *Notice of Appeal* filed contemporaneously herewith. I have personal knowledge of the matters set forth herein.

3. Attached hereto as Exhibit A is a true and correct copy of the *Memorandum Opinion*, dated July 28, 2023 [Dkt. 1127].

4. Attached hereto as Exhibit B is a true and correct copy of the *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* [Dkt. 1211].

5. Attached hereto as Exhibit C is a true and correct list of the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 5, 2023

Respectfully submitted,

/s/ Seth Van Aalten  
Seth Van Aalten